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Attorney for Defendant Skyworks Solutions, Inc.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

DENSO CORPORATION,

Plaintiff,

v.

SKYWORKS SOLUTIONS, INC.,
AND SKYWORKS FILTER
SOLUTIONS JAPAN CO. LTD,

Defendants.

CASE NO. 8:25-cv-01329-FWS

JOINT MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER

Plaintiff DENSO Corporation and Defendant Skyworks Solutions, Inc.¹
(collectively, the “Parties”) respectfully submit the attached proposed Protective Order for
the Court’s consideration and approval. The Parties respectfully submit that good cause
exists to enter this proposed order at this stage in the case for the limited purpose of
permitting DENSO to produce agreements it has signed with third parties covering asserted

¹ Defendant Skyworks Solutions Inc. respectfully joins this motion for a protective order
pursuant to Federal Rule of Civil Procedure 26(c), solely for the purpose of preserving its
rights pending resolution of threshold issues. Defendant Skyworks Solutions Inc.
expressly reserves all defenses available under Federal Rule of Civil Procedure 12(b),
and this filing shall not be construed as a general appearance or as a waiver of any Rule
12(b) defenses.

1 U.S. Patent No. 7,758,979. All other discovery shall proceed in accordance with Federal
2 Rule 26, the local rules, and this Court's scheduling order(s).

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4 Dated: November 7, 2025

By: /s/ James M. Dowd

James M. Dowd

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*Attorney for Defendant Skyworks
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12
13 Dated: November 7, 2025

By: /s/ Joseph M. Casino

Joseph M. Casino

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24 *Attorneys for Plaintiff DENSO*
25 *Corporation*

SIGNATURE CERTIFICATION

I, James Dowd, am the ECF user whose identification and password are being used to file this stipulation. Pursuant to Civil Local Rule 5-4.3.4, I hereby certify that the content of this document is acceptable to all other signatories listed, and on whose behalf the filing is submitted, concur with the filing's content and have authorized the filing.

Dated: November 7, 2025

By: /s/ James M. Dowd

James M. Dowd